

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XIAOLING CHE AND JINYAN DUAN

Plaintiffs,

v.

SHENZHEN XIMEIKEJI YOUXIAN GONGSI;
SHENZHEN MUMUWAN MAOYI YOUXIAN
GONG SI; QINGYUNXIANGESIWEI-
SHANGMAOYOUXIANGONGSI; and
SHENZHEN MENGDU DU CHONGWU
YONGPIN YOUXIAN GONGSI

Defendants.

Case No. 1:25-cv-04946

**PLAINTIFFS' MOTION FOR ENTRY OF A TEMPORARY
RESTRAINING ORDER AND A PRELIMINARY INJUNCTION**

Plaintiffs Xiaoling Che (“Che”) and Jinyan Duan (“Duan”) (collectively, “Plaintiffs”) hereby move for entry of a temporary restraining order (“TRO”) and a preliminary injunction (“PI”) against Defendants Shenzhen Ximeikeji Youxian Gongsi (“XM Official”); Shenzhen Mumuwan Maoyi Youxian Gong Si (“Woodever Direct”); QingYunXianGeSiWeiShangMaoYouXianGongSi (“GeSiWeiShangMao”); and Shenzhen Mengdudu Chongwu Yongpin Youxian Gongsi (“PetMagic Shop”) (collectively, “Defendants”)¹ and state as follows:

1. Plaintiffs filed this action pursuant to 35 U.S.C. § 271 to combat online patent infringers who sell puzzle board products infringing Plaintiffs’ U.S. Patent No. 12,220,648 (the

¹ Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction may be treated as one for a Preliminary Injunction since counsel for Defendants, Zheng Liu and Zhan Jin, entered appearances on May 8, 2025 (Dkt. 6, 7), and therefore Defendant has notice of this Motion and an opportunity to respond. *See* Fed. R. Civ. P. 65(a)(1) (“The court may issue a preliminary injunction only on notice to the adverse party”).

“’648 patent”) entitled, “Movable Puzzle Platform.”

2. Plaintiffs seek injunctive relief against Defendants to prevent Defendants from selling infringing puzzle board products through, *inter alia*, Amazon.com with the following Amazon Standard Identification Numbers (“ASINs”):

Defendant	Amazon Store Name	ASIN(s)
Shenzhen Ximeikeji Youxian Gongsi	XM Official	B0CNSS2S59 B0CYW9MQST
Shenzhen Mumuwan Maoyi Youxian Gong Si	Woodever Direct	B0CZCSVXKW B0D49HG8GF
QingYunXianGeSiWeiShang-MaoYouXianGongSi	GeSiWeiShangMao	B0DT65CX2Z
Shenzhen Mengdudu Chongwu Yongpin Youxian Gongsi	PetMagic Shop	B0DT8VFLKX

The puzzle boards identified above and all materially similar puzzle boards under different brand names and/or versions (former, current, or future) are collectively referred to as the “Accused Products.”

3. Defendants target their sales of the Accused Products throughout the United States, including within the State of Illinois, through their network of e-commerce shops and online presences. Absent immediate intervention, Plaintiffs will continue to suffer irreparable harm due to Defendants’ unauthorized and infringing sales.

4. For these reasons, Plaintiffs seek an order enjoining Defendants from making, using, selling, offering to sell, or importing into the United States Accused Products.

5. In further support, Plaintiff incorporates its Memorandum of Law, which is being filed concurrently with this motion.

WHEREFORE, for these reasons and those more fully set forth in the Memorandum, Plaintiffs respectfully ask that the Court enter an order enjoining Defendants from making, using, selling, offering to sell, and importing into the United States any Accused Product on Amazon.com or elsewhere. A Proposed Order accompanies this motion.

Dated: May 23, 2025

Respectfully submitted,

By /s/Mengmeng Luo

Mengmeng Luo (admitted)

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